## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF IOWA

In re:  MERCY HOSPITAL, IOWA CITY, IOWA, et al.,	)	Chapter 11 Case No. 23-00623 (TJC)
Debtors.	)	(Jointly Administered)
	)	Objections Due: June 13, 2024 at 4:00 p.m Hearing Date: <i>Only if objections are filed</i>

NOTICE OF THIRD INTERIM APPLICATION OF CUTLER LAW FIRM, P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM MARCH 5, 2024 THROUGH MAY 30, 2024

**PLEASE TAKE NOTICE** that on the 30<sup>th</sup> day of May, 2024, Culter Law Firm, P.C. filed its *Third Interim Application for Allowance of Compensation of Attorneys Fees and Costs for Associate Counsel to the Official Committee of Unsecured Creditors for the Time Period March 5, 2024 through and including May 30, 2024 (the "Application") with the United States Bankruptcy Court for the Northern District of Iowa (the "Court").* 

PLEASE TAKE NOTICE that objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 224] and must be filed with the Court and served so as to be received by the following parties no later than **June 13, 2024 at 4:00 p.m.:** 

- 1. Mercy Hospital, Iowa City, Iowa, 500 E. Market Street, Iowa City, Iowa 52245, Attn: Mark E. Toney (noticing@mercyic.org);
- 2. Counsel to the Debtors: (A) McDermott Will & Emery LLP, 444 W. Lake Street, Suite 4000, Chicago, Illinois 60606, Attn: Felicia Gerber Perlman, (fperlman@mwe.com), Daniel M. Simon (dsimon@mwe.com), and Emily C. Keil (ekeil@mwe.com) and 2501 North Harwood Street, Suite 1900, Dallas, TX 75201, Jack G. Haake (jhaake@mwe.com), and (B) Nyemaster Goode, P.C., 625 First Street SE, Suite 400, Cedar Rapids, IA 52401-2030, Attn: Roy R. Leaf (rleaf@nyemaster.com);
- 3. Counsel to the Committee: (A) Cutler Law Firm, P.C., 1307 50th Street, West Des Moines, IA 50266, Attn: Robert C. Gainer (rgainer@cutlerfirm.com), and (B) Sills Cummis & Gross P.C., The Legal Center, One Riverfront Plaza, Newark, NJ 07102, Attn: Andrew H. Sherman (asherman@sillscummis.com) and Boris Mankovetskiy (bmankovetskiy@sillscummis.com);

- 4. Office of the United States Trustee for the Northern District of Iowa, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner (Janet.G.Reasoner@usdoj.gov); and
- 5. Counsel to the Bondholder Representatives: (A) Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., One Financial Center, Boston, MA 02111, Attn: William Kannel (wkannel@mintz.com), Nathan F. Coco (nfcoco@mintz.com), and Megan Preusker (mpreusker@mintz.com), and (B) Whitfield & Eddy, P.C., 699 Walnut Street, Suite 2000, Des Moines, IA 5030, Attn: Peter J. Chalik (chalik@whitfieldlaw.com).

**PLEASE TAKE FURTHER NOTICE** that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the "<u>Hearing</u>") on the Application will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

Dated: May 30, 2024

Respectfully Submitted,

/s/ Robert C. Gainer

Robert C. Gainer IS9998471 CUTLER LAW FIRM, P.C. 1307 50th Street

West Des Moines, Iowa 50266 Telephone: 515-223-6600 Facsimile: 515-223-6787

E-mail: <a href="mailto:rgainer@cutlerfirm.com">rgainer@cutlerfirm.com</a>
CO-COUNSEL FOR THE OFFICIAL

COMMITTEE OF UNSECURED CREDITORS

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2024, the foregoing instrument was filed electronically with the Clerk of Court using the CM/ECF system which sent notification of such filing to all registered users party to this proceeding, including the United States Trustee.